

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

2010 NOV -4 P 3:00

CLERK'S OFFICE  
AT BALTIMORE

BY \_\_\_\_\_ DEPUTY

Federal Trade Commission

Plaintiff,

v.

Innovative Marketing, Inc., *et al.*

Defendants.

CIVIL NO. RDB 08-CV-3233

**STIPULATED PROTECTIVE ORDER**

Upon the motion of the Federal Trade Commission and Kristy Ross for a stipulated protective order, IT IS HEREBY ORDERED AS FOLLOWS:

1. Any and all forensic images of computer servers belonging to ByteHosting Internet Services, LLC and/or James Reno that are provided to the Defendants by the FTC shall be returned to the FTC upon the resolution of the FTC's lawsuit against the Defendants, unless otherwise ordered by the Court. All copies withheld by the Defendants by express order of this Court shall be preserved only so long as is necessary for further proceedings related to this case, after which they shall be returned to the FTC or destroyed. The Court may require a certification as to the disposition of any such materials retained.

2. Any and all forensic images of computer servers belonging to ByteHosting Internet Services, LLC and/or James Reno that are provided to the Defendants by the FTC ("ByteHosting Forensic Images") may be utilized by the Defendants and their counsel solely in connection with the defense of this case and for no other purpose and in connection with no other proceeding. The ByteHosting Forensic Images shall not be disclosed either directly or indirectly to any person or entity other than Defendants, Defendants' counsel, persons employed or engaged by defense counsel to assist in the defense, or such other persons to

whom the Court specifically authorizes disclosure. The ByteHosting Forensic Images shall not be disclosed either directly or indirectly to any person or entity outside of the United States, without the prior application to and authorization from the Court. Any notes or records of any kind that defense counsel may make relating to the ByteHosting Forensic Images shall not be disclosed to anyone other than the Defendants, Defendants' counsel, and persons employed or engaged by defense counsel to assist in the defense, or such other person as to whom the Court may authorize disclosure, and all such notes and records shall not be disclosed except as provided by this Order.

3. The ByteHosting Forensic Images provided to the Defendants by the FTC shall not be copied or reproduced, except to provide copies of the material for use by each defense lawyer and the Defendants and such persons as are employed by defense counsel to assist in the defense, and such copies and reproductions shall be treated in the same manner as the original matter.

4. The restrictions set forth in this Order do not apply to documents that are in the public record or domain. In addition, this Order does not apply to any materials that Defendants obtain from any sources other than the FTC.

IT SO ORDERED, this 4<sup>th</sup> day of NOVEMBER, 2010

  
Richard D. Bennett  
United States District Judge

Acknowledgment: Through counsel I have read the Order and agree to comply with its requirements.

KRISTY ROSS

By:



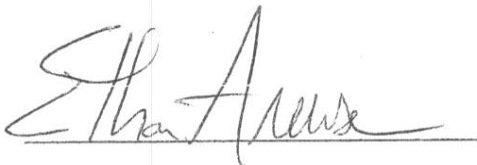
Tom Kirsch  
Winston & Strawn  
35 W. Wacker Drive  
Chicago, Illinois  
60601-9703

Carolyn Gurland  
2731 N. Mildred Avenue  
Chicago, IL 60614

DATE: Oct 31, 2010

FEDERAL TRADE COMMISSION

By:



Ethan Arenson  
Colleen B. Robbins  
2099 Pennsylvania Avenue, N.W.  
Washington, DC 20580

DATE: 11/3/10